

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON**

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| <b>IN RE: ETHICON, INC., PELVIC REPAIR<br/>SYSTEM PRODUCTS LIABILITY<br/>LITIGATION</b><br><br><b>THIS DOCUMENT RELATES TO:</b><br><br><b>ETHICON WAVE 12 CASES LISTED IN<br/>PLAINTIFFS' EXHIBIT A</b> | <b>Master File No. 2:12-MD-02327<br/>MDL 2327</b><br><br><b>JOSEPH R. GOODWIN<br/>U.S. DISTRICT JUDGE</b> |
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**NOTICE OF ADOPTION OF PRIOR *DAUBERT* RESPONSE REGARDING  
CHARLES HANES, M.D. FOR WAVE 12**

Defendants Ethicon, Inc. and Johnson & Johnson (collectively “Ethicon”) hereby respond to Plaintiffs’ Notice of Adoption of Prior Daubert Motion of Charles Hanes, M.D. for Wave 12, Dkt. 8718. Ethicon adopts and incorporates by reference the *Daubert* response in relation to Dr. Charles Hanes filed by Ethicon in Wave 11, Dkt. 8655. Ethicon respectfully requests that the Court deny Plaintiffs’ motion, for the reasons expressed in its Wave 11 response briefing.

Respectfully submitted,

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COUNSEL FOR DEFENDANTS

**CERTIFICATE OF SERVICE**

I certify that on this day, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

William M. Gage